

SAO

JOHN W. THOMSON, ESQ.,
Nevada State Bar No. 5802
THOMSON LAW PC
2900 W. Horizon Ridge Pkwy, Suite 200
Henderson, NV 89052
Telephone: (702) 478-8282
Facsimile: (702) 541-9500
Email: johnwthomson@ymail.com
Attorney for Defendants
Reinier Hoogenraad and Benjamin Montgomery

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MIROSLAV KEFURT, derivatively on
behalf of BREMACH, INC., a Nevada
Corporation,
Plaintiff,

vs.

REINIER “RAY” HOOGENRAAD, an
Individual, BENJAMIN “BEN”
MONTGOMERY, an Individual,
Defendants.

BREMACH, INC., a Nevada Corporation.
Nominal Defendant.

CASE NO.: 2:22-cv-01774-JAD-BNW

**THIRD STIPULATION AND ORDER TO
CONTINUE DISCOVERY DEADLINES
AND TRIAL**

(THIRD REQUEST)

COME NOW, MIROSLAV KEFURT (“Plaintiff”), by and through his counsel Leah Martin Law, and REINIER HOOGENRAAD, and BENJAMIN MONTGOMERY (collectively “Defendants” and together with Plaintiff, the “Parties”), by and through their counsel John W. Thomson, Esq., of Thomson Law PC, and Thomas Greco, Esq., of O’hara & Greco A Law Corporation, hereby stipulate and agree to extend the discovery deadlines and trial as follows:

I. DISCOVERY COMPLETED

1. The Plaintiff and Defendant RH submitted initial documents and witnesses;

2. Plaintiff propounded his first sets of written discovery on Defendants;

3. Defendant RH responded to the first set of written discovery.

II. DISCOVERY THAT REMAINS TO BE COMPLETED

4. Depositions of the Parties, experts, and third-party witnesses;

5. Any additional supplemental written discovery that may be needed;

6. Any other discovery which may be determined as relevant and necessary by the Parties.

III. REASONS WHY DISCOVERY WAS NOT COMPLETED WITHIN THE CURRENT DEADLINES

The Parties have been actively participating in discovery but requires additional time to complete discovery. This stipulation is not submitted for any improper purpose or to unnecessarily delay the proceedings. There have been multiple motions filed that need to be resolved before committing resources to the remaining discovery.

The Parties submit that good cause exists to grant the stipulated ninety-day extension of the discovery deadlines and trial for the following reasons: Defendants previously involved an attorney who is not licensed to practice within Nevada, however, Mr. Greco has been admitted to practice Pro Hac Vice and there is pending hearing on Plaintiff's Motion to Disqualify Attorney Greco for hearing on January 30, 2024. Depending on the hearing's outcome, the parties will plan on sending out subpoenas, and scheduling depositions.

PROPOSED EXTENDED DEADLINES

Deadline	Current Deadline	Proposed
Close of Discovery	Jan 30, 2024	Apr 30, 2024
Dispositive Motions	Mar 4, 2024	Jun 3, 2024
Joint Pre-Trial Order	Apr 2, 2024	July 1, 2024

IV. THIS EXTENSION WILL AFFECT THE TRIAL DATE

The requested extension would affect the trial date. The Parties respectfully request that

1 the trial date be rescheduled to the Court's next available trial date.

2 **V. CONCLUSION**

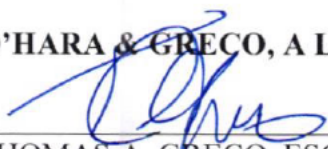
3 Based upon the foregoing, the Parties respectfully request and submit that good cause
4 exists, and for the Court to adopt the forgoing deadlines and reschedule trial in this case.

5
6 DATED THIS 9th day of January, 2024.

7
8 **THOMSON LAW PC**

9 /s/ John W. Thomson, Esq.
10 JOHN W. THOMSON, ESQ.
11 Nevada Bar No. 5802
12 2900 W. Horizon Ridge Pkwy,
Suite 200 Henderson, NV 89052
(702) 478-8282

13 **O'HARA & GRECO, A Law Corporation**

14 
15 THOMAS A. GRECO, ESQ.,
16 Admitted Pro Hac Vice
17 25361 Commercentre Drive, Suite 150
18 Lake Forest, California 92630
19 Attorney for Defendants

8 **LEAH MARTIN LAW**

9 /s/ Kevin Hejmanowski, Esq.
Kevin Hejmanowski, Esq.,
Nevada Bar No. 10612
Leah Martin, Esq.,
601 W. South Rancho Drive, Suite C-26
Las Vegas, NV 89106
702-420-2733
Attorneys for Plaintiff

ORDER:

Pursuant to the Parties' stipulation, **IT IS SO ORDERED.**

IT IS SO ORDERED

DATED: 6:13 am, January 11, 2024



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE